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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEXANDER SHANNON)
 Plaintiff,)
 v.)
 DEBORSHI GHOSH)
 Defendant)

Civil Action No. PS-13-10 - PBS**EX PARTE MOTION TO FILE UNDER SEAL
AND IMPOUND ALL INITIAL FILINGS**

Pursuant to Local Rule 7.2, and for good cause shown, the Plaintiff, Alexander Shannon (“Shannon”), hereby moves that this court allow Shannon to file this action under seal and requests an order for the impoundment of all initial pleadings, motions, affidavits and other filings in this action that contain and repeat the admittedly false, defamatory statements made by the Defendant Deborshi Ghosh (“Ghosh”), which are set forth in detail in the Verified Complaint, the Affidavits of Shannon, Richard A. Parry and Jeffrey E. Francis, and in Shannon’s Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction, which repeats and has copies of those defamatory statements.

Alternatively, Shannon requests that he may be permitted to file redacted copies of the Verified Complaint, the Affidavits of Shannon, Richard A. Parry and Jeffrey E. Francis, and the Memorandum of Law in Support of Motion for Temporary Restraining Order and Preliminary Injunction, which redacts the actual statements and the email identity of Shannon, his parents, and non-litigant third parties to whom the statements were published by Ghosh.